

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

DIANNE JACOBS, Individually and as	)	
Special Administrator for the purposes of	)	
this Lawsuit on behalf of Decedent RITA	)	
TREUTEL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 12-cv-00899
	)	
3M COMPANY, <i>et al.</i> ,	)	
	)	
Defendants.	)	

DECLARATION OF BRIAN WATSON  
IN SUPPORT OF OWENS-ILLINOIS, INC.'S  
STATEMENT OF PROPOSED FINDINGS OF FACT

I, Brian O. Watson, declare as follows:

1. I am an attorney with the law firm of Schiff Hardin LLP and counsel in this case for Defendant Owens-Illinois, Inc. I make this declaration on my own personal knowledge in support of Owens-Illinois, Inc.'s Statement of Proposed Findings of Fact. If called to testify as to the truth of the matters stated herein, I could and would do so competently.
2. Attached as **Exhibit A** is a true and correct copy of an agreement between Owens-Illinois Glass Company and Owens-Corning Fiberglas Corporation, dated May 9, 1958.
3. Attached as **Exhibit B** is a true and correct copy of Defendant Owens Corning Responses to Plaintiff Pursuant to Court Order, dated March 17, 1998, from the Plaintiffs' Initial Disclosures under Rule 26(a)(1).

4. Attached as **Exhibit C** is a true and correct copy of a Roddis Architectural Fact Sheet from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

5. Attached as **Exhibit D** is a true and correct copy of a letter from Norbert A. McKenna, Reynolds & Co., dated July 20, 1948, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

6. Attached as **Exhibit E** is a true and correct copy of Development of Fireproof Door Core, Armour Research Foundation, dated January 25, 1949, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

7. Attached as **Exhibit F** is a true and correct copy of a letter from L.A. Ropella, Chief Chemist, Roddis Plywood Corporation, dated February 11, 1949, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

8. Attached as **Exhibit G** is a true and correct copy of a memorandum from Sales Administrator, Roddis Plywood Corporation, dated November 10, 1950, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

9. Attached as **Exhibit H** is a true and correct copy of a memorandum from Ted Magarian, Roddis Plywood Corporation, dated November 7, 1952, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives

Division, Stevens Point.

10. Attached as **Exhibit I** is a true and correct copy of a memorandum from S.P. Walsh, Roddis Plywood Corporation, dated August 18, 1953, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

11. Attached as **Exhibit J** is a true and correct copy of a memorandum from M.W. Day, Roddis Plywood Corporation, dated November 13, 1953, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

12. Attached as **Exhibit K** is a true and correct copy of a memorandum from S.P. Walsh, Roddis Plywood Corporation, dated April 13, 1954, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

13. Attached as **Exhibit L** is a true and correct copy of a memorandum from S.P. Walsh, Roddis Plywood Corporation, dated May 18, 1954, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

14. Attached as **Exhibit M** is a true and correct copy of a memorandum from L.A. Ropella, Chief Chemist, Roddis Plywood Corporation, dated September 8, 1954, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

15. Attached as **Exhibit N** is a true and correct copy of a United States Patent

No. 2,797,450, dated July 2, 1957, from the United States Patent and Trademark Office.

16. Attached as **Exhibit P** is a true and correct copy of an inter-office communication from Robert Beggs, Executive Vice Present, Roddis Plywood Corporation, dated August 30, 1955, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

17. Attached as **Exhibit Q** is a true and correct copy of a letter from C.H. Blanchar, Roddis Plywood Corporation, dated February 3, 1956, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

18. Attached as **Exhibit R** is a true and correct copy of a letter from W.A. Schaich, Owens-Illinois, Inc., dated February 8, 1956, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

19. Attached as **Exhibit S** is a true and correct copy of an agreement between Owens-Illinois Glass Company and Roddis Plywood Company, dated March 15, 1956, from Weyerhaeuser Company's Supplemental Objections and Responses to Plaintiffs' Request for Production of Documents.

20. Attached as **Exhibit T** is a true and correct copy of minutes from a special meeting of the Board of Directors of Roddis Plywood Corporation, dated August 17, 1959, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

21. Attached as **Exhibit U** is a true and correct copy of a securities statement

from Roddis Plywood Corporation, dated October 1959, from the Roddis Plywood Corporation Records, 1897-1967, Wisconsin Historical Society, Archives Division, Stevens Point.

22. Attached as **Exhibit V** is a true and correct copy of File No. R3575, Underwriters Laboratories, Inc., dated June 22, 1954 and including later revisions, from the Plaintiffs' Initial Disclosures under Rule 26(a)(1).

23. Attached as **Exhibit W** is a true and correct copy of the Final Order, dated June 4, 1960, from *In re Dissolution of Owens-Illinois Plywood Company, Inc.*, State of Vermont, Orleans County.

24. Attached as **Exhibit X** is a true and correct copy of the Annual Report of Weyerhaeuser Company, dated 1960, from the Foster Business Library, University of Washington.

25. Attached as **Exhibit Y** is a true and correct copy of File No. R3575, Underwriters Laboratories, Inc., dated March 1, 1961 and including later revisions, from Plaintiffs' Initial Disclosures under Federal Rule of Civil Procedure 26(a)(1).

26. Attached as **Exhibit Z** is a true and correct copy of the General Orders on Dusts, Fumes, Vapors, and Gases, Industrial Commission of Wisconsin, effective March 18, 1932, including Order 2002 amended, effective January 22, 1941, and Order 2002 amended, effective December 7, 1947, from the Industrial Commission of Wisconsin.

Dated: May 14, 2015

Respectfully submitted,

By: /s/Brian O. Watson

Brian O. Watson  
Schiff Hardin LLP  
233 S. Wacker Dr. Suite 6600  
Chicago, Illinois 60606  
(312) 258-5500  
(312) 258-5600 (facsimile)

*Attorneys for Defendant  
Owens-Illinois, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on May 14, 2015, these papers were filed with the Clerk of the Court for the United States District Court for the Western District of Wisconsin using the CM/ECF system, which will send notification of such filing upon all parties who have appeared.

/s/ Brian O. Watson  
Brian O. Watson

15640-1246

CH2\16260426.2